

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

MAY 06 2015

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

**1.) CHLOE ALYSE McCLENDON,
2.) DOMONIQUE RASHAD THOMAS,
A/K/A DOMINIQUE RASHAD THOMAS,
A/K/A "TEEN", A/K/A "NIQUE",
3.) ALICIA LENA MYLES,
A/K/A "LELE",
Defendants**

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15CR233

CR. NO.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

(CONSPIRACY TO COMMIT WIRE FRAUD – 18 U.S.C. 1349)

A. THE CONSPIRACY AND ITS OBJECTS

1. Beginning on or about the year 2010 until on or about March 2, 2015, in the Houston Division of Southern District of Texas and elsewhere,

**CHLOE ALYSE McCLENDON,
DOMONIQUE RASHAD THOMAS, A/K/A DOMINIQUE
RASHAD THOMAS, A/K/A "TEEN" A/K/A "NIQUE", and
ALICIA LENA MYLES,**

defendants herein, did knowingly combine, conspire, confederate, and agree with others known and unknown to the Grand Jury to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and in execution of said scheme and artifice, transmit or cause to be transmitted by means of wire in interstate commerce, writings, signs, signals, pictures and sounds for the purpose of executing said scheme or artifice to defraud in violation of Title 18, United States Code, Section 1343.

B. THE MANNER AND MEANS OF THE CONSPIRACY

It was a part of the conspiracy that:

2. The defendants would and did obtain the stolen personal identifying information (PII) of others from the Department of State, Passport Administration.

3. The defendants would and did transmit the stolen PII to and from each other.

4. The defendants would and did use the stolen PII to create counterfeit identification documents.

5. The defendants would and did recruit accomplices to assume the stolen identities and use the counterfeit documents to obtain commercial lines of credit and to purchase iPhones, iPads, and other electronic merchandise.

6. The defendants would and did cause commercial entities to transmit the stolen PII to assist in the establishment of commercial lines of credit.

C. OVERT ACTS

6. In furtherance of the conspiracy, and to effect the objects thereof, the defendants performed and caused to be performed, among others, the overt acts set forth in Counts Two through Nine of this Indictment, hereby re-alleged and incorporated as if fully set forth in this Count of the Indictment.

All in violation of Title 18, United States Code 1349.

COUNTS 2 THROUGH 5
(WIRE FRAUD – 18 U.S.C. 1343 and 2)

A. THE SCHEME AND ARTIFICE

1. From on or about the year 2010 until on or about March 3, 2015,
in the Houston Division of Southern District of Texas and elsewhere,

**CHLOE ALYSE McCLENDON,
DOMONIQUE RASHAD THOMAS, A/K/A DOMINIQUE
RASHAD THOMAS, A/K/A “TEEN” A/K/A “NIQUE”, and
ALICIA LENA MYLES,**

defendants herein, aided and abetted by others known and unknown to the grand jury, did knowingly devise and intend to devise a scheme and artifice to defraud, and for obtaining money by means of false and fraudulent pretenses, and in the execution of said scheme and artifice, did knowingly transmit and cause to be transmitted by means of wire communications in interstate or foreign commerce, writings, signs, signals, pictures, or sounds, as more fully set forth in the counts below.

B. MANNER AND MEANS OF THE SCHEME AND ARTIFICE

2. Among the deceitful and dishonest means by which the defendants sought to accomplish and did accomplish the purpose of the scheme to defraud were the acts set forth in paragraphs 2-6 of Count 1 of this Indictment, are re-alleged and incorporated as if fully set forth in these counts of the Indictment.

C. EXECUTION OF THE SCHEME AND ARTIFICE

3. On or about the following dates, the defendants executed the scheme and artifice set forth above by knowingly transferring, by electronic means to obtain in store credit, the PII of the victims described in the counts below:

COUNT	DATE	VICTIM
2	December 30, 2014	A.D.
3	January 13, 2015	N.A.
4	January 14, 2015	P.S.
5	February 8, 2015	E.V.

In violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS 6 THROUGH 9
(AGGRAVATED IDENTITY THEFT – 18 U.S.C. 1028A and 2)

From on or about the year 2010 until on or about March 3, 2015, in the Houston Division of Southern District of Texas and elsewhere,

CHLOE ALYSE McCLENDON,
DOMONIQUE RASHAD THOMAS, A/K/A DOMINIQUE
RASHAD THOMAS, A/K/A “TEEN” A/K/A “NIQUE”, and
ALICIA LENA MYLES,

defendants herein, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another, that is, the name, address, and social security number of the real persons listed in the counts below, during and in relation to a violation of 18 U.S.C. § 1349 (Conspiracy to Commit Wire

Fraud); 18 U.S.C. §1343 (Wire Fraud); and 18 U.S.C. §1028A (Aggravated Identity Theft):

COUNT	DATE	VICTIM
6	January 10, 2015	A.D.
7	January 13, 2015	N.A.
8	January 14, 2015	P.S.
9	February 8, 2015	E.V.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

TRUE BILL:

Original Signature on File

~~FOREPERSON~~ OF THE GRAND JURY

KENNETH MAGIDSON
United States Attorney

By:



RALPH E. IMPERATO
Assistant United States Attorney

By:



ALAMDAR HAMDANI
Assistant United States Attorney